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October 20, 2020

BY ELECTRONIC FILING

Hon. Claude M. Hilton, Senior Judge
United States District Court
Eastern District of Virginia – Alexandria
401 Courthouse Square
Alexandria, VA 22314

Re: UMG Records, Inc., et al. v. Tofiq Kurbanov, et al.
Case No. 1:18-CV-00957-CMH-TCB
Our File No. 021773/096773
Hearing Date: October 23, 2020 – 10:00 a.m.

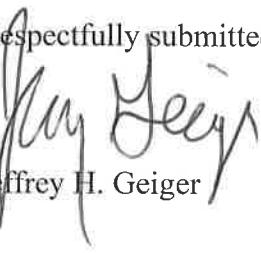
Dear Judge Hilton:

In light of the ongoing pandemic, counsel for Mr. Kurbanov requests respectfully that the hearing scheduled for October 23, 2020, on “Plaintiffs’ Motion for Reconsideration of Court’s September 18, 2020 Stay Order” [Doc. 61], be held via tele-conference or video-conference.

In addition to the challenges associated with an in-person hearing, the parties are represented in part by *pro hac vice* counsel, who reside outside of the Eastern District of Virginia. Defense counsel need to participate in the hearing and anticipate that travel under current conditions will be particularly difficult. Defense counsel submits respectfully that holding the hearing remotely will be the safest and most efficient way to ensure that they can participate fully.

Thank you for your consideration.

Respectfully submitted,


Jeffrey H. Geiger

cc: **BY E-MAIL**

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